

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JANE DOE, an individual Michigan resident  
Filing anonymously under a fictitious name,

Plaintiff,

vs.

MAMOUN DABBAGH, M.D.,

Defendant

CASE NO. 2:15-cv-10724

HON. STEPHEN J. MURPHY III

HON. ELIZABETH A. STAFFORD

Nakisha N. Chaney (P65066)  
NACHT, ROUMEL, SALVATORE,  
BLANCHARD & WALKER, P.C.  
Attorney for Plaintiff  
101 N. Main Street, Ste. 558  
Ann Arbor, Michigan 48104  
(734) 663-7550

STEPHEN M. RYAN PLLC  
Stephen M. Ryan (P27717)  
Attorney for Defendant  
30700 Telegraph Road, Suite 1677  
Bingham Farms, Michigan 48025  
(248) 723-8500  
(2480 723-8501 (fax)  
[smryanpllc@aol.com](mailto:smryanpllc@aol.com)

**DEFENDANT'S ANSWER TO COMPLAINT,**  
**AFFIRMATIVE DEFENSES AND RELIANCE UPON JURY DEMAND**

**NOW COMES** the Defendant herein, Dr. Mamoun Dabbagh, by and through his attorneys, Stephen M. Ryan, PLLC, by Stephen M. Ryan, and in answer to the Complaint filed in this matter, states as follows: First, in an unnumbered paragraph on page 1 of the Complaint, certain allegations are made against the Defendant, and all of the said allegations are denied as untrue.

**PARTIES, JURISDICTION AND VENUE**

1. Answering paragraph no. 1, this Defendant denies all allegations contained therein as untrue.
2. Answering paragraph no. 2, this Defendant denies all allegations contained therein as untrue.

3. Answering paragraph no. 3, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

4. Answering paragraph no. 4, this Defendant pleads no contest.

5. Answering paragraph no. 5, this Defendant pleads no contest.

### **GENERAL ALLEGATIONS**

#### **Plaintiff Is Ensnared in a Human Trafficking Ring**

6. Answering paragraph no. 6, this Defendant denies all allegations contained therein as untrue.

7. Answering paragraph no. 7, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

8. Answering paragraph no. 8, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

9. Answering paragraph no. 9, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

10. Answering paragraph no. 10, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

11. Answering paragraph no. 11, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

12. Answering paragraph no. 12, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

13. Answering paragraph no. 13, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

14. Answering paragraph no. 14, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

15. Answering paragraph no. 15, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein,

and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

16. Answering paragraph no. 16, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

17. Answering paragraph no. 17, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

18. Answering paragraph no. 18, this Defendant denies all allegations contained therein as untrue.

19. Answering paragraph no. 19, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

20. Answering paragraph no. 20, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

21. Answering paragraph no. 3, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and



therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

22. Answering paragraph no. 22, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

23. Answering paragraph no. 23, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

24. Answering paragraph no. 24, this Defendant denies all allegations contained therein as untrue.

25. Answering paragraph no. 25, this Defendant denies all allegations contained therein as untrue.

26. Answering paragraph no. 26, this Defendant denies all allegations contained therein as untrue.

27. Answering paragraph no. 27, this Defendant denies all allegations contained therein as untrue.

28. Answering paragraph no. 28, this Defendant denies all allegations contained therein as untrue.

29. Answering paragraph no. 29, this Defendant denies all allegations contained therein as untrue and further affirmatively avers that any drugs prescribed by Defendant to Plaintiff were meant for Plaintiff to take as prescribed.

30. Answering paragraph no. 30, this Defendant denies all allegations contained therein as untrue.

31. Answering paragraph no. 22, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

32. Answering paragraph no. 22, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

**Defendant Mamoun Dabbagh, M.D.**

33. Answering paragraph no. 33, this Defendant denies all allegations contained therein as untrue.

34. Answering paragraph no. 34, this Defendant admits same.

35. Answering paragraph no. 35, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs, however, Defendant states that psychotropic drugs are simply those drugs typically prescribed by psychiatrists.

**Dabbagh Provided Prescriptions for Psychotropic Medications to Trafficker Mark White**

36. Answering paragraph no. 36, this Defendant denies all allegations contained therein as untrue.

37. Answering paragraph no. 37, this Defendant admits same, but Defendant did not know at any time that Plaintiff was being "held" by White.

38. Answering paragraph no. 38, this Defendant denies all allegations contained therein as untrue.

39. Answering paragraph no. 39, this Defendant denies all allegations contained therein as untrue.

40. Answering paragraph no. 40, this Defendant denies all allegations contained therein as untrue.

41. Answering paragraph no. 41, this Defendant admits same.

42. Answering paragraph no. 42, this Defendant admits same.

43. Answering paragraph no. 43, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

44. Answering paragraph no. 44, this Defendant denies all allegations contained therein as untrue.

45. Answering paragraph no. 45, this Defendant denies all allegations contained therein as untrue.

46. Answering paragraph no. 46, this Defendant denies all allegations contained therein as untrue.

47. Answering paragraph no. 47, this Defendant denies all allegations contained therein as untrue.

48. Answering paragraph no. 48, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

50. Answering paragraph no. 50, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

51. Answering paragraph no. 51, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

52. Answering paragraph no. 52, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs, and further avers that based upon his medical treatment of Plaintiff, Defendant prescribed certain drugs for Plaintiff.

53. Answering paragraph no. 53, this Defendant denies all allegations contained therein as untrue.

54. Answering paragraph no. 54, this Defendant denies all allegations contained therein as untrue.

55. Answering paragraph no. 55, this Defendant denies all allegations as pled as untrue.



56. Answering paragraph no. 56, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

57. Answering paragraph no. 57, this Defendant denies all allegations contained therein as untrue. Defendant further avers that a pharmacy would have had to fill the prescriptions and that these drugs prescribed for Plaintiff by Defendant were meant to be taken by Plaintiff as prescribed.

58. Answering paragraph no. 58, this Defendant denies all allegations contained therein as untrue.

59. Answering paragraph no. 59, this Defendant denies all allegations contained therein as untrue.

60. Answering paragraph no. 60, this Defendant admits same, but further avers that Defendant followed all appropriate standards of care.

61. Answering paragraph no. 61, this Defendant denies all allegations contained therein as untrue.

**Plaintiff Escaped and White Committed Suicide**

62. Answering paragraph no. 62, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

63. Answering paragraph no. 63, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein,

and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

64. Answering paragraph no. 64, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

65. Answering paragraph no. 65, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

66. Answering paragraph no. 66, this Defendant is without sufficient knowledge or information to form a belief as to the truth of the matters asserted therein, and therefore neither admits nor denies the allegations contained therein but leaves the Plaintiff to her strict proofs.

**CLAIM FOR RELIEF**

**COUNT 1**

**TVPRA OF 2008  
Knowingly Benefitting from Participation  
In Venture Involving Human Trafficking  
18 U.S.C. § 1595**

67. Answering paragraph No. 67, this Defendant hereby incorporates by reference thereto all of his answers to paragraphs 1 through 66, above, as if set forth herein word for word.

68. Answering paragraph no. 68, this Defendant denies all allegations contained therein as untrue.

69. Answering paragraph no. 69, this Defendant denies all allegations contained therein as untrue.

69a. Answering paragraph no. 69a, this Defendant denies all allegations related to Defendant's prescribed medication contained therein as untrue.

69b. Answering paragraph no. 69b, this Defendant denies all allegations related to Defendant's prescribed medication therein as untrue.

69c. Answering paragraph no. 69c, this Defendant denies all allegations related to Defendant's prescribed medication therein as untrue.

70. Answering paragraph no. 70, this Defendant denies all allegations contained therein as untrue.

71. Answering paragraph no. 70, this Defendant denies all allegations contained therein as untrue.

71a. Answering paragraph no. 71a, this Defendant denies all allegations contained therein as untrue.

71b. Answering paragraph no. 71b, this Defendant denies all allegations contained therein as untrue.

71c. Answering paragraph no. 71c, this Defendant denies all allegations contained therein as untrue.

71d. Answering paragraph no. 71d, this Defendant denies all allegations contained therein as untrue.

71e. Answering paragraph no. 71e, this Defendant denies all allegations contained therein as untrue.

71f. Answering paragraph no. 71f, this Defendant admits same but specifically denies any of the drugs' effects as pled by Plaintiff in her Complaint. All drugs prescribed by Defendant to Plaintiff were proper and, in fact, greatly helped Plaintiff.

71g. Answering paragraph no. 71g, this Defendant denies all allegations contained therein as untrue.

72. Answering paragraph no. 72, this Defendant denies all allegations contained therein as untrue.

73. Answering paragraph no. 73, this Defendant denies all allegations related to Defendant's prescribed medications contained therein as untrue.

WHEREFORE, this Defendant respectfully requests that this Court dismiss Plaintiff's entire Complaint with prejudice and award to Defendant all of his costs and attorneys fees pursuant to F.R.Cv.P.11.

### **AFFIRMATIVE DEFENSES**

**NOW COMES** the Defendant herein, by and through his attorneys, Stephen M. Ryan, PLLC, by Stephen M. Ryan, and hereby pleads the following Affirmative Defenses:

1. Plaintiff's claims are barred by the applicable statutes of limitations.
2. Defendant received absolutely no benefit, financial or otherwise, in meeting with and treating Plaintiff, including but not limited to, writing her prescriptions for drugs.



3. Plaintiff fails to state a claim upon which relief may be granted.

4. In an unnumbered paragraph in her Complaint, Plaintiff states “Dabbagh Provided Prescriptions for Psychotropic Medications to Trafficker Mark White,” and Defendant denies all of these allegations as untrue.

5. Throughout her Complaint, Plaintiff pleads that Defendant prescribed “psychotropic” drugs or medications to Plaintiff as if they are sinister; but “psychotropic” drugs are merely drugs that are prescribed by psychiatrists.

6. Throughout her Complaint, the Plaintiff attributes to the two drugs prescribed to her by Defendant certain effects which these drugs do not produce, either by design or as so-called “side effects.” In fact, the two prescriptions written for Plaintiff by Defendant have the intended effects exactly the opposite as alleged in Plaintiff’s Complaint, that is, Celexa is prescribed for depression and Adderall is prescribed to help organize one’s mind and to increase energy, to help concentration and to help the patient’s mind focus with the intended effect being that the patient makes better decisions. Thus, having filled the prescriptions on March 26, 2013, approximately 35 days after taking the Celexa and the Adderall, the Plaintiff began making better decisions and disregarded the threats of White and made the informed and much better decision of merely walking across the street to the Southfield Police Department to file a criminal complaint against White, which resulted in the police raid on White’s apartment a few days later. These better decisions by Plaintiff resulted in her freedom from White.

7. The allegations made in Plaintiff’s Complaint as to Defendant are not only false but scandalous in the extreme as to a well-respected and pre-eminent psychiatrist, and Defendant shall file a motion to strike the pleadings and/or for a protective order.

8. Plaintiff assumed all risks associated with her claims related to White stated in her Complaint by her own conduct.

9. Defendant reserves the right to add affirmative defenses as they may become known through discovery.

**JURY DEMAND**

**NOW COMES** the Defendant and relies upon Plaintiff's jury demand.

Respectfully submitted,

STEPHEN M. RYAN, P.L.L.C.

By: 

Stephen M. Ryan (P27717)  
Attorney for Defendant  
30700 Telegraph Road, Suite 1677  
Bingham Farms, MI 48025  
(248) 723-8500  
(248) 723-8501 (Fax)  
[smryanpllc@aol.com](mailto:smryanpllc@aol.com)

DATED: April 8, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that on April 8, 2015 served Defendant's Answer to Complaint, Affirmative Defenses and Jury Demand with this Certificate of Service with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Nakisha N. Chaney, Esq.  
NACHT, ROUMEL, SALVATORE,  
BLANCHARD & WALKER, P.C.  
101 N. Main Street, Ste. 558  
Ann Arbor, Michigan 48104

*I declare under penalty of perjury that the statement above is true to the best of my information, knowledge and belief.*

Signature Daphne Chuney  
Daphne Chuney